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DEPT. OF TRANSPORTATION **DOCKETS**

IN REPLY, REFER TO: L390-04-2314

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Docket Management Facility U.S. Department of Transportation, 400 Seventh Street, SW. Nassif Building, Room PL-401 Washington, DC 20590-0001

ATTENTION: Docket No. FAA-2004-17041

SUBJECT:

Noise Stringency Increase for Single-Engine Propeller-Driven Small

Airplanes

This proposed rule change lowers the noise limit for propeller-driven small airplanes. The purpose is stated as simplifying airworthiness approvals for import and export purposes based on noise limit harmonization with ICAO standards. The synopsis of the rule states that "The task group studied several stringency options for the airplanes in the database, and decided to propose new noise stringency levels that are at the noise levels of current production airplanes. The proposed noise stringency level reflects the current noise abatement technology that is applied to the single-engine propeller driven small airplanes in production. However, the rule change leaves the Cessna Model 206H over the limit as shown in the figure attached. The certification of an acoustic change to this aircraft would require a large effort and high cost to meet this proposed rule change.

While harmonization of the test procedures has simplified the certification effort greatly, the harmonization of limits is not seen as a significant benefit. To increase stringency for the purpose of harmonization alone puts an undue burden on aircraft manufacturers.

Sincerely,

CESSNA AIRCRAFT COMPANY

Larry Van Dyke

Director of Airworthiness and Product Safety

Cc: David Brant

Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes

Effect of New Limits on Certain Cessna Single Engine Propeller-Driven Small Airplanes

